

## Schoellkopf, Lynde

---

**From:** Kordzi, Joe  
**Sent:** Thursday, July 09, 2015 9:36 AM  
**To:** DeYoung, Robyn  
**Cc:** Donaldson, Guy; Feldman, Michael; Snyder, Erik; Schoellkopf, Lynde  
**Subject:** FW: Our ERCOT report bullet list  
**Attachments:** ERCOT report.pdf; TX-OK SiP and FIP proposal as published.pdf

Hi Robin,

As we discussed, we would appreciate it if Synapse would provide a high level analysis of the attached report provided by ERCOT regarding the potential impacts of our Regional Haze FIP on grid reliability. I've also attached our proposed FIP for context. If this level of analysis by Synapse will require that we transfer funds into the contract, please let me know. I will be working from home until Monday and can be reached at 5 U.S.C. Sec 552(b)(6) - Monday and later at 214-665-7186.

In summary, it appears ERCOT is asserting that every utility that is subject to our FIP is vulnerable to shutting down rather than installing the controls proposed in our FIP and if this happens grid reliability issues could arise.

So the first question we would like feedback on is if, as suggested by ERCOT, all or some of the units subject to the FIP choose to shutdown rather than install controls, would the grid be able to handle it or would there be reliability problems? Further, if some units shutdown, can Synapse give us any feedback on the amount of shutdowns to be concerned about?

The second question is how realistic is the scenario that all or some will shut down rather than control?

In considering the above questions, we think Synapse should consider the following factors and questions:

5 U.S.C. Sec. 552(b)(5)- Deliberative



Joe Kordzi  
EPA Region 6

*" . . . and miles to go before I sleep."*  
- Robert Frost

## Schoellkopf, Lynde

---

**From:** Schoellkopf, Lynde  
**Sent:** Thursday, July 09, 2015 9:39 AM  
**To:** Lucinda Watson; Suzanne Smith  
**Subject:** FW: Our ERCOT report bullet list  
**Attachments:** ERCOT report.pdf; TX-OK SIP and FIP proposal as published.pdf

---

**From:** Kordzi, Joe  
**Sent:** Thursday, July 09, 2015 9:36 AM  
**To:** DeYoung, Robyn  
**Cc:** Donaldson, Guy; Feldman, Michael; Snyder, Erik; Schoellkopf, Lynde  
**Subject:** FW: Our ERCOT report bullet list

Hi Robin,

As we discussed, we would appreciate it if Synapse would provide a high level analysis of the attached report provided by ERCOT regarding the potential impacts of our Regional Haze FIP on grid reliability. I've also attached our proposed FIP for context. If this level of analysis by Synapse will require that we transfer funds into the contract, please let me know. I will be working from home until Monday and can be reached at 5 U.S.C. Sec 552(b)(6) Monday and later at 214-665-7186.

In summary, it appears ERCOT is asserting that every utility that is subject to our FIP is vulnerable to shutting down rather than installing the controls proposed in our FIP and if this happens grid reliability issues could arise.

So the first question we would like feedback on is if, as suggested by ERCOT, all or some of the units subject to the FIP choose to shutdown rather than install controls, would the grid be able to handle it or would there be reliability problems? Further, if some units shutdown, can Synapse give us any feedback on the amount of shutdowns to be concerned about?

The second question is how realistic is the scenario that all or some will shut down rather than control?

In considering the above questions, we think Synapse should consider the following factors and questions:

- 5 U.S.C. Sec. 552(b)(5)- Deliberative

- 

- 

- 

- 

-

Joe Kordzi  
EPA Region 6

*" . . . and miles to go before I sleep."*  
- Robert Frost

## Schoellkopf, Lynde

---

**From:** DeYoung, Robyn  
**Sent:** Wednesday, July 15, 2015 2:14 PM  
**To:** Kordzi, Joe  
**Cc:** Donaldson, Guy; Feldman, Michael; Snyder, Erik; Schoellkopf, Lynde  
**Subject:** RE: Our ERCOT report bullet list

Hi Joe,

The current update is our main contact at Synapse returned from vacation and is currently reviewing the ERCOT report to determine the level of effort it will take to address your questions. I am due to hear about from him Tuesday July 21<sup>st</sup>. I will send you more details as they unfold.

Robyn

---

**From:** Kordzi, Joe  
**Sent:** Thursday, July 09, 2015 10:36 AM  
**To:** DeYoung, Robyn  
**Cc:** Donaldson, Guy; Feldman, Michael; Snyder, Erik; Schoellkopf, Lynde  
**Subject:** FW: Our ERCOT report bullet list

Hi Robin,

As we discussed, we would appreciate it if Synapse would provide a high level analysis of the attached report provided by ERCOT regarding the potential impacts of our Regional Haze FIP on grid reliability. I've also attached our proposed FIP for context. If this level of analysis by Synapse will require that we transfer funds into the contract, please let me know. I will be working from home until Monday and can be reached at 469-728-4305. Monday and later at 214-665-7186.

In summary, it appears ERCOT is asserting that every utility that is subject to our FIP is vulnerable to shutting down rather than installing the controls proposed in our FIP and if this happens grid reliability issues could arise.

So the first question we would like feedback on is if, as suggested by ERCOT, all or some of the units subject to the FIP choose to shutdown rather than install controls, would the grid be able to handle it or would there be reliability problems? Further, if some units shutdown, can Synapse give us any feedback on the amount of shutdowns to be concerned about?

The second question is how realistic is the scenario that all or some will shut down rather than control?

In considering the above questions, we think Synapse should consider the following factors and questions:

5 U.S.C. Sec. 552(b)(5)- Deliberative



Joe Kordzi  
EPA Region 6

*" . . . and miles to go before I sleep."*  
- Robert Frost

## **Schoellkopf, Lynde**

---

**From:** Schoellkopf, Lynde  
**Sent:** Wednesday, July 15, 2015 2:57 PM  
**To:** Lucinda Watson  
**Subject:** FW: Our ERCOT report bullet list

---

**From:** DeYoung, Robyn  
**Sent:** Wednesday, July 15, 2015 2:14 PM  
**To:** Kordzi, Joe  
**Cc:** Donaldson, Guy; Feldman, Michael; Snyder, Erik; Schoellkopf, Lynde  
**Subject:** RE: Our ERCOT report bullet list

Hi Joe,

The current update is our main contact at Synapse returned from vacation and is currently reviewing the ERCOT report to determine the level of effort it will take to address your questions. I am due to hear about from him Tuesday July 21<sup>st</sup>. I will send you more details as they unfold.

Robyn

---

**From:** Kordzi, Joe  
**Sent:** Thursday, July 09, 2015 10:36 AM  
**To:** DeYoung, Robyn  
**Cc:** Donaldson, Guy; Feldman, Michael; Snyder, Erik; Schoellkopf, Lynde  
**Subject:** FW: Our ERCOT report bullet list

Hi Robin,

As we discussed, we would appreciate it if Synapse would provide a high level analysis of the attached report provided by ERCOT regarding the potential impacts of our Regional Haze FIP on grid reliability. I've also attached our proposed FIP for context. If this level of analysis by Synapse will require that we transfer funds into the contract, please let me know. I will be working from home until Monday and can be reached at 469-728-4305. Monday and later at 214-665-7186.

In summary, it appears ERCOT is asserting that every utility that is subject to our FIP is vulnerable to shutting down rather than installing the controls proposed in our FIP and if this happens grid reliability issues could arise.

So the first question we would like feedback on is if, as suggested by ERCOT, all or some of the units subject to the FIP choose to shutdown rather than install controls, would the grid be able to handle it or would there be reliability problems? Further, if some units shutdown, can Synapse give us any feedback on the amount of shutdowns to be concerned about?

The second question is how realistic is the scenario that all or some will shut down rather than control?

In considering the above questions, we think Synapse should consider the following factors and questions:

- Did ERCOT factor in the Luminant bankruptcy in its projections? Is it possible to consider the impact of the bankruptcy?

**Based on the e-mail traffic, it did not look like Synapse could come up with which EGUs in Texas would have to shut down, only an at most an agreement with the ERCOT report that because of the myriad EPA regulations, a potential percentage of EGUs in Texas may have to shut down, which would adversely affect the grid. I am not sure if Synapse agrees with ERCOT, what facts would PD use to recommend fewer controls? We will not know which EGUs so what would be the methodology?**

---

**From:** Donaldson, Guy  
**Sent:** Thursday, July 02, 2015 8:08 AM  
**To:** Watson, Lucinda; Kordzi, Joe  
**Cc:** Schoellkopf, Lynde; Feldman, Michael; Snyder, Erik; Smith, Suzanne  
**Subject:** RE: Please Send me the ERCOT Comments

I think we are missing the forest for the trees here. I don't believe it can be a misuse of our resources to investigate whether something we are doing could result in power outages. Feel free to elevate the issue if you feel strongly about it.

I would like the high level review.

5 U.S.C. Sec. 552(b)(5)- Deliberative



---

**From:** Watson, Lucinda  
**Sent:** Wednesday, July 01, 2015 4:38 PM  
**To:** Kordzi, Joe; Donaldson, Guy  
**Cc:** Schoellkopf, Lynde; Feldman, Michael; Snyder, Erik; Smith, Suzanne  
**Subject:** RE: Please Send me the ERCOT Comments

**There still is no suggestion that having this work done will result in any facts, only potentially an agreement of Synapse with ERCOT's predictions, based upon no facts. Spending monies and/or time now on something that will not benefit the agency at this time could be viewed as misuse of funds and time.**

---

**From:** Kordzi, Joe  
**Sent:** Wednesday, July 01, 2015 4:10 PM  
**To:** Donaldson, Guy  
**Cc:** Watson, Lucinda; Schoellkopf, Lynde; Feldman, Michael; Snyder, Erik  
**Subject:** RE: Please Send me the ERCOT Comments

Robin DeYoung called me to discuss the possibility of having the ERCOT report reviewed by Synapse. She said that was a possibility, but that we would likely not receive their response until about 8/15, considering the people involved are on vacation for the next 12 days. She said that if they did just an upper-level review of about 8-10 hrs, her contract would



probably be able to cover it, but if we wanted a more in-depth review, we would have to talk about moving some funds into her contract.

I have not changed my views that it is not possible to predict what the impact on the grid will be at this time and that any such an assessment is too speculative to be meaningful. However, if you want me to pursue this, then Robin wants me to send her an email w/ some background, the report, and the degree of review desired. Considering that she stated that if they limit their review to 8-10 hrs for an upper-level review we likely wouldn't have to pay for it, we could ask them to review it from the standpoint of whether they believe there is enough info in the report to reach the conclusions ERCOT did. It may be possible to get this level of review sooner than 8/15. If Synapse then replies that they do believe it merits further review, we can go from there.

---

**From:** Donaldson, Guy  
**Sent:** Monday, June 29, 2015 11:19 AM  
**To:** Kordzi, Joe; Watson, Lucinda; Schoellkopf, Lynde  
**Subject:** RE: Please Send me the ERCOT Comments

Well it good to know that we have a legal response. I'm not sure that the fact that no response is required legally is going to be enough as a policy matter.

If Luminant shuts down all their units and the power goes out and they blame our rules, its going to be a problem for all of us.

I still think we should see whether we can get some feedback from the HQs contractor.

---

**From:** Kordzi, Joe  
**Sent:** Monday, June 29, 2015 11:10 AM  
**To:** Watson, Lucinda; Donaldson, Guy; Schoellkopf, Lynde; Aisling, Kathleen  
**Subject:** RE: Please Send me the ERCOT Comments

That's where I'm at. Neither we nor ERCOT know if and when EGUs will shut down.

---

**From:** Watson, Lucinda  
**Sent:** Monday, June 29, 2015 11:01 AM  
**To:** Donaldson, Guy; Schoellkopf, Lynde; Aisling, Kathleen; Kordzi, Joe  
**Subject:** RE: Please Send me the ERCOT Comments

**The beauty of the Administrative Procedures Act, the CAA, and case law is that even if a comment presents reasonable speculation, it remains speculation and therefore no response is required - We have no data upon which to rest a final decision. We can add to the RTC that when/if we receive data in support of the speculation, we will reevaluate.**

---

**From:** Donaldson, Guy  
**Sent:** Monday, June 29, 2015 10:58 AM  
**To:** Watson, Lucinda; Schoellkopf, Lynde; Aisling, Kathleen; Kordzi, Joe  
**Subject:** RE: Please Send me the ERCOT Comments

You know I guess my problem with just saying no supporting documentation is that we all suspect that Luminant with its financial difficulties will not be able to afford controls. So while its speculation, it seems like reasonable speculation.